

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

MARIA DEVERANT

v.

SELECTIVE INSURANCE COMPANY

No. 02-CV-3801

**NOTICE OF MOTION PURSUANT TO  
LOCAL RULE OF CIVIL PROCEDURE 13(b) and 83.5.2**

Please take notice that the defendants have filed the within Motion for admission of counsel Pro Hac Vice with the Clerk of Court for the Eastern District of Pennsylvania. Pursuant to the local rules of Court, if you wish to oppose said motion, you have thirteen (13) days in which to respond since service of the within motion is being made by United States First Class mail, postage prepaid. If you do not respond to the motion in a timely fashion, it may be treated as uncontested.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN AND GOGGIN

BY:

DANIEL KREBBS, ESQUIRE  
1845 Walnut Street  
Philadelphia, PA 19103  
Attorneys for Defendant,  
Selective Insurance Company

DATE:

\\01\_21\\LIAB\\DDK\\LLPG\\345591\\KSZ\\15036\\00113

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

MARIA DEVERANT

v.

SELECTIVE INSURANCE COMPANY

No. 02-CV-2801

**ORDER**

AND NOW, this                      day of                      , 2002, upon  
consideration of the Motion of defendant, Selective Insurance Company for the  
admission of counsel Pro Hac Vice, it is hereby ORDERED and DECREED that said  
Motion is GRANTED; and that Gerald J. Nielsen, Esquire and John D. Carter, Esquire, is  
hereby admitted Pro Hac Vice to appear on behalf of moving defendant in the above-  
captioned matter.

BY THE COURT:

---

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARIA DEVERANT

v.

SELECTIVE INSURANCE COMPANY

No. 02-CV-2801

**MOTION OF DEFENDANT, SELECTIVE INSURANCE COMPANY,**  
**FOR ADMISSION OF COUNSEL PRO HAC VICE**

Defendant, Selective Insurance Company, by and through their attorneys of record, Marshall, Dennehey, Warner, Coleman and Goggin, hereby move for the admission of Gerald J. Nielsen, Esquire and John D. Carter, Esquire pursuant to Rules 13(b) and 83.5.2 of the Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania, and in support thereof aver the following:

1. Daniel D. Krebbs, Esquire, an attorney in the firm of Marshall, Dennehey, Warner, Coleman and Goggin, has entered his appearance of record on behalf of Selective Insurance Company, in connection with their claims asserted by plaintiffs in their Complaint.
2. Dennis D. Krebbs, Esquire, an attorney in the firm of Marshall, Dennehey, Warner, Coleman and Goggin, will continue to act as associate counsel and/or co-counsel on behalf of Selective Insurance Company in accordance with Rule 13(a) of the local Rules of Civil Procedure.
3. The admission of Gerald J. Nielsen, Esquire and John D. Carter, Esquire, Pro Hac Vice in this matter will further the prompt, just, effective and efficient resolution of the claims hereunder as is more fully asserted in the accompanying Affidavit of Daniel D. Krebbs, Esquire which is incorporated herein by reference.

WHEREFORE, defendant, Selective Insurance Company pray that the relief sought in the attached Order hereto be granted.

Respectfully Submitted,  
MARSHALL, DENNEHEY, WARNER,  
COLEMAN AND GOGGIN

BY:  
DANIEL D. KREBBS, ESQUIRE  
1845 Walnut Street  
Philadelphia, PA 19103  
(215) 575-2600

Attorneys for Defendant,  
Selective Insurance Company

DATE:

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

\_\_\_\_\_  
MARIA DEVERANT

v.

SELECTIVE INSURANCE COMPANY

:  
:  
:  
No. 02-CV-2801  
:  
:  
:

**AFFIDAVIT OF DANIEL KREBBS, ESQUIRE, IN SUPPORT OF**  
**DEFENDANT'S MOTION FOR ADMISSION OF COUNSEL**  
**PRO HAC VICE**

I, **DANIEL D. KREBBS, ESQUIRE**, being duly sworn according to law  
deposes and says:

1. I am a member in good standing and I am admitted to practice in the Bars  
of the Commonwealth of Pennsylvania and the state of New Jersey and have been a  
member since 1994; (I am also admitted to practice before the United States District  
Court for the Eastern District of Pennsylvania)

2. Gerald J. Nielsen, Esquire and John D. Carter, Esquire are members of  
The Nielsen Law Firm which has been retained by defendant, Selective Insurance  
Company to act as their national coordinating counsel for all cases involving claims  
under the National Flood Insurance Program, including the instant matter. Marshall,  
Dennehey, Warner, Coleman and Goggin, has been retained to appear as associate and  
co-counsel in this matter.

3. Both Gerald J. Nielsen, Esquire and John D. Carter, Esquire are admitted  
to practice and are members in good standing of the bar of the state of Louisiana.

4. I am familiar with both Gerald J. Nielsen, Esquire and John D. Carter, Esquire, and can verify that both have significant experience in the litigation of National Flood Insurance Program insurance coverage matters similar to those presented by the plaintiffs hereunder. In addition, I can attest that both are gentlemen of character and their integrity is beyond reproach.

5. The admission for this case Pro Hac Vice with respect to the claims asserted in Plaintiffs' Amended Complaint will further the prompt, just, effective and efficient resolution of these claims. I, therefore, respectfully request that Gerald J. Nielsen, Esquire and John D. Carter, Esquire, be admitted to practice before this Court in the above-captioned matter only.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN AND GOGGIN

BY: \_\_\_\_\_  
DANIEL KREBBS, ESQUIRE  
1845 Walnut Street  
Philadelphia, PA 19103  
(215) 575-2600

Attorney for Defendant,  
Selective Insurance Company

DATE:  
\\01\_21\\LIAB\\DDK\\LLPG\\345591\\KSZ\\15036\\00113

**VERIFICATION**

I, **Daniel Krebs**, Esquire, attorney at Marshall, Dennehey, Warner, Coleman and Goggin, affirms and declares that my client, Selective Insurance Company, and the appropriate agents, servants, workmen or employees concerning this lawsuit are beyond the jurisdiction of the Court and that in order to obtain an appropriate Verification the time limits in which to respond to the plaintiff's pleading will not be met, and accordingly I am authorized to take this Verification and the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

---

**DANIEL KREBBS, ESQUIRE**

**VERIFICATION**

DANIEL KREBBS, Esquire, hereby states that he is attorney for defendant, Selective Insurance Company, and verifies that the statements made in the foregoing Motion for Admission of Counsel Pro Hac Vice are true and correct to the best of his knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. section 4904 relating to unsworn falsification to authorities.

DANIEL KREBBS, ESQUIRE

DATED:

\\01\_21\LIAB\DDK\LLPG\345591\KSZ\15036\00113



**CERTIFICATION OF SERVICE**

I hereby certify that I have served upon all persons listed below a true and correct copy of Motion of Defendant Selective Insurance Company, for Admission of Counsel Pro Hac Vice in the above-captioned matter this date by First Class United States mail, postage prepaid.

Joseph T. Kelley, Jr., Esquire  
Patrick G. Murphy, Esquire  
Kelley & Murphy  
Union Meeting Corporate Ctr.  
925 Harvest Drive, Suite 160  
Blue Bell Pa. 19422

MARSHALL, DENNEHEY, WARNER  
COLEMAN AND GOGGIN

BY: \_\_\_\_\_  
DANIEL D. KREBBS, ESQUIRE  
Attorney for Defendant  
Selective Insurance Company

DATED:

\01\_21\LIAB\DDK\LLPG\345591\KSZ\15036\00113